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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO: 15-392 RS
)	
Plaintiff,)	STIPULATION TO EXCLUDE TIME AND
)	PROPOSED ORDER
v.)	
)	
RYAN CARDENAS,)	
)	
Defendant.)	
)	
)	

The parties request that the time between March 16, 2016, and September 19, 2016, be excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B). The government has produced discovery to defense counsel, who will be reviewing it and conducting other investigation to prepare for trial. Excluding time until the trial date of September 19, 2016, will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

IT IS SO STIPULATED.

DATED: March 17, 2016

/s/
BENJAMIN KINGSLEY
Assistant United States Attorney

DATED: March 17, 2016

/s/
CANDIS MITCHELL
Counsel for Defendant Ryan Cardenas

~~[PROPOSED]~~ ORDER

The Court finds that the exclusion of the period from March 16, 2016, to September 19, 2016, from the time limits applicable under 18 U.S.C. § 3161, is warranted; that the ends of justice served by the continuance outweigh the interests of the public and the defendant in the prompt disposition of this criminal case; and that the failure to grant the requested exclusion of time would deny counsel for the defendant and for the government the reasonable time necessary for effective preparation and of counsel, taking into account the exercise of due diligence, and would result in a miscarriage of justice. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

IT IS SO ORDERED.

DATED: 3/17/16



HON. RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE